





VIA ELECTRONIC AND OVERNIGHT MAIL

Raymond Basso, Strategic Integration Manager Emergency and Remedial Response Division U.S. Environmental Protection Agency 290 Broadway, 19th Floor New York, New York 10007-1866

Re:

Lower Passaic River Study Area

Supplemental Request for Information

Dear Mr. Basso:

Givaudan Fragrances Corporation ("Givaudan") hereby responds to the Supplemental Request for Information Pursuant to 42 U.S.C. Section 9601-9675 from the United States Environmental Protection Agency ("EPA"), dated September 2, 2009, related to the Lower Passaic River Study Area. This letter supplements Givaudan's prior submission and response to EPA's prior 104(e) Information Request in this matter.

As agreed among the parties, and as confirmed in Ms. Flanagan's email of September 23, 2009, Givaudan will provide its response to the Supplemental Request for Information in two submissions (Part 1 and Part 2) with Part 1 of Givaudan's response submitted below and Part 2 of Givaudan's response due by November 12, 2009.

The following is Part 1 of Givaudan's Response:

1. Provide all information about sewer decommissioning and demolition of buildings on the former Givaudan facility located at 125 Delawanna Avenue, Clifton, New Jersey (the "Givaudan facility") including a copy of the report entitled Remedial Action Report for Sewer Decommissioning (ERM, February 2000), referred to in Givaudan's July 12, 2004 response to EPA's May 13, 2004 Request for Information.

RESPONSE:

As requested, Givaudan hereby provides EPA with a copy of the Remedial Action Report for Sewer Decommissioning (ERM, February 2000), with Attachments and Appendices (Attachment A). This report provides a comprehensive discussion and detailed information on the sewer decommissioning activities that occurred at the former Givaudan facility located at 125 Delawanna Avenue, Clifton, New Jersey (the "Former Givaudan Facility").

Building demolition activities and construction work occurred during various times over the operational history at the Former Givaudan Facility. Due to the passage of time, documents related to most of the historical demolition are no longer in the possession of Givaudan. Records of demolition activities were either not kept or were discarded in the ordinary course. Givaudan has searched its files and has located summary information on a portion of the historical demolition activities at the Former Givaudan Facility.

Attached hereto is a copy of a summary table prepared of all demolition activities between 1970 and 1982, and a 1982 site map showing existing buildings on the Former Givaudan Facility (Attachment B). This summary table was originally provided by Givaudan to the New Jersey Department of Environmental Protection ("NJDEP") in response to a NJDEP inquiry in 1983. It was also provided to EPA as Attachment 4 to Volume I of Givaudan's July 9, 2004 Request for Information Response Document.

Based on available records from the early-1980's to late-1990's, it is believed that several buildings located at the Former Givaudan Facility were demolished in or around that time period. Attached hereto is a post-closure map of the Former Givaudan Facility showing the existing buildings on-site in January 1999 (Attachment C). This map was originally provided by Givaudan to NJDEP in its Remedial Action Work Plan for Soils (ERM, April 2000).

The following information is a summary of the building demolition activities that took place at the Former Givaudan Facility in 1998-1999. In 1998, Givaudan entered into a contract with Universal Process Equipment, Inc. entitled "Agreement for Removal and Disposal of the Structure, Asbestos and Equipment from Designated Buildings". The Agreement provided for equipment, supervision, labor, utilities and permits to operate a complete crushing facility at the Former Givaudan Facility. The work included concrete crushing, removal of transite panels, and demolition work by American Wrecking Corporation (demolition contractor). The work included demolition of all remaining structures at the Former Givaudan Facility, south of Delawanna Avenue, prior to the redevelopment of the property. (Attachment D).

Attached are available photos from approximately 2001 of the Site after demolition activities were completed. (Attachment E).

2. Provide all sediment and/or water column data collected by Givaudan in or adjacent to the Passaic River, Third River and Yantacaw Lake.

RESPONSE:

Other than the recent sediment data collected by the Lower Passaic River Cooperating Parties Group ("CPG"), Givaudan does not possess any sediment and/or water column data in or adjacent to the Passaic River, Third River and/or Yantacaw Lake. As a member of the CPG, Givaudan is participating in and funding the CPG work on the Remedial Investigation/Feasibility Study ("RI/FS") of the Lower Passaic River. In 2008, the CPG collected sediment samples, and the group is now preparing to collect water column samples within the study area. The CPG has provided EPA with all sediment data gathered to date and will provide EPA with all water column data under the RI/FS process.

3. Provide any effluent data (wastewater sampling results) from the hexachlorophene production area and/or the entire Givaudan facility, other than the 1980 – 1981 results provided in Givaudan's July 12, 2004 response to EPA's may 13, 2004 Request for Information.

RESPONSE:

Givaudan is currently searching for the requested information. Upon completion of its search, Givaudan will provide any information obtained to EPA in Part 2 of its Response to EPA's Supplemental 104(e) Information Request.

4. Provide all historical photos, including aerial photos, showing conditions and/or operations at the Givaudan facility and/or conditions in the area surrounding the Givaudan facility including Yantacaw Lake and the Third River, in the possession or control of Givaudan and/or Givaudan's contractors or consultants.

RESPONSE:

Givaudan hereby provides copies of available aerial photos of the Former Givaudan Facility and the area surrounding the Former Givaudan Facility, including Yantacaw Lake and the Third River. (Attachment F).

¹ The original aerial photos are believed to be in the possession of ERM, Inc. at its Exton, PA office. ERM is the consultant that conducted the prior investigations and remedial work at the Former Givaudan Facility.

As noted above, Givaudan continues its search for information requested under Question 3 of EPA's 104(e) Information Request. The company will supplement its response to EPA upon completion of its search with any effluent data that is located. At this time, Givaudan hopes to complete its search and submit the second part of its submission by November 12, 2009. A representative of Givaudan will contact you if additional time is needed to complete Part 2 of the company's response.

Thank you for your consideration in this matter.

Very truly yours,

By. John A. Vernieri

Date: 10/12/2009

Enclosures

cc: Ms. Sarah Flanagan

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Versey:

County of Ssex:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

John A. Vernieri NAME (print or type)

EVP Consumer Products
TITLE (print or type)

SIGNATURE

Sworn to me this/2 day of Oct 2009

Notary Public Signature

MEGNAN FOWELL EVANS
Notary Public
State of New Jersey
My Commission Expires Jul 3, 2012

ATTACHMENT A

REMEDIAL ACTION REPORT FOR SEWER DECOMMISSIONING (ERM, FEBRUARY 2000)

Givaudan Roure Corporation

Remedial Action Report for Sewer Decommissioning Clifton, New Jersey

February 2000

22329.00.01

Environmental Resources Management 855 Springdale Drive Exton, Pennsylvania 19341



THE REMAINDER OF THE REMEDIAL ACTION REPORT FOR SEWER DECOMMISSIONING (ERM, FEBRUARY 2000) IS PROVIDED IN THE ENCLOSED BOXES

ATTACHMENT B

SUMMARY TABLE OF DEMOLITION ACTIVITIES (1970-1982)

7/25/83

D.E.P. INQUIRY

DEMOLITION

1. Demolition Activities

To the best of our knowledge no demolition took place prior to 1970.

Exhibit I - Listing of Activity Exhibit II - Map

- 2. Activities Conducted
 - A. Private residence
 - B. Former Goodlatte Linoleum Works independent of Givaudan ceased operation approximately 1950, produced floor coverings, used by Hoffmann la Roche as warehouse during 1960's.
 - C. Krouse Doremus Foundry independent of Givaudan, ceased operation approximately 1965, produced metal castings.
 - D. Private residence
 - E. Private residence
 - F. Building 48
 Warehouse for Givaudan production
 - G. Buildings 1, 2, 3, 4, 4A, 5, 6; 8, 12, 12A, 12B, 13, 14, 20, 21 & 40 These buildings with the exception of 20, 21, & 40 were interconnected.

The great majority of products were distillation operations.

Several natural products such as terpintine, cloves and iris roots were extracted over the years.

See Exhibit III

Demolition Contractors

See Exhibit I

4. Final Deposition of Rubble

Terms of contract for demolition include disposal of rubble in compliance with Federal, State and Local regulations.

5. Fill Materials

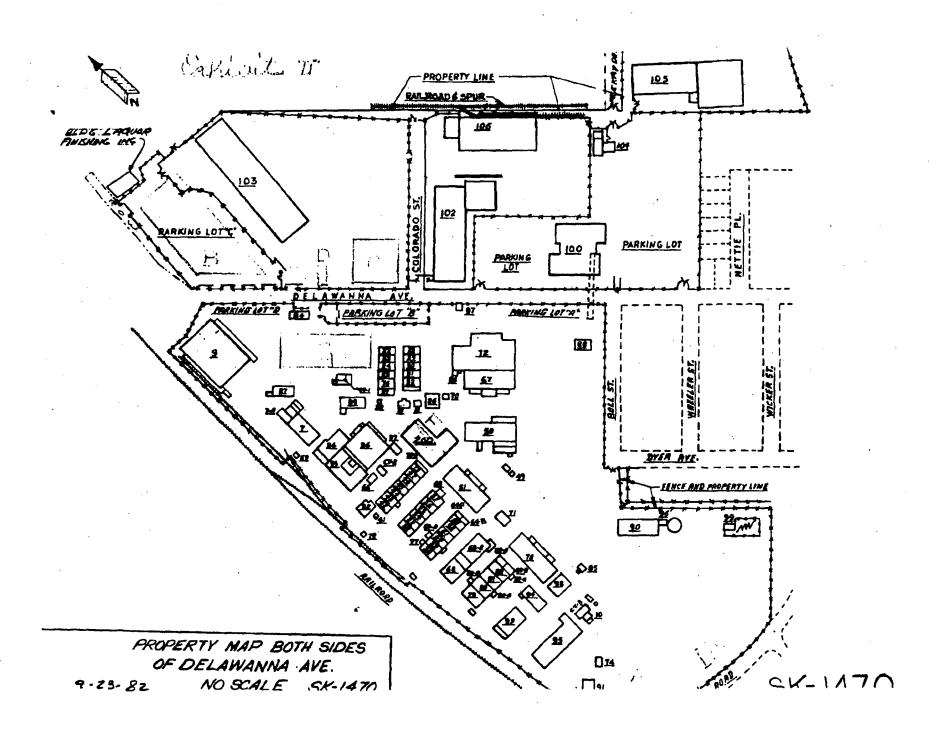
No material from offsite has been placed on property south of Delawanna Avenue, except commercial sand and gravel.

No material from the site south of Delawanna has been placed on the site north of Delawanna Avenue.

EXHIBIT I

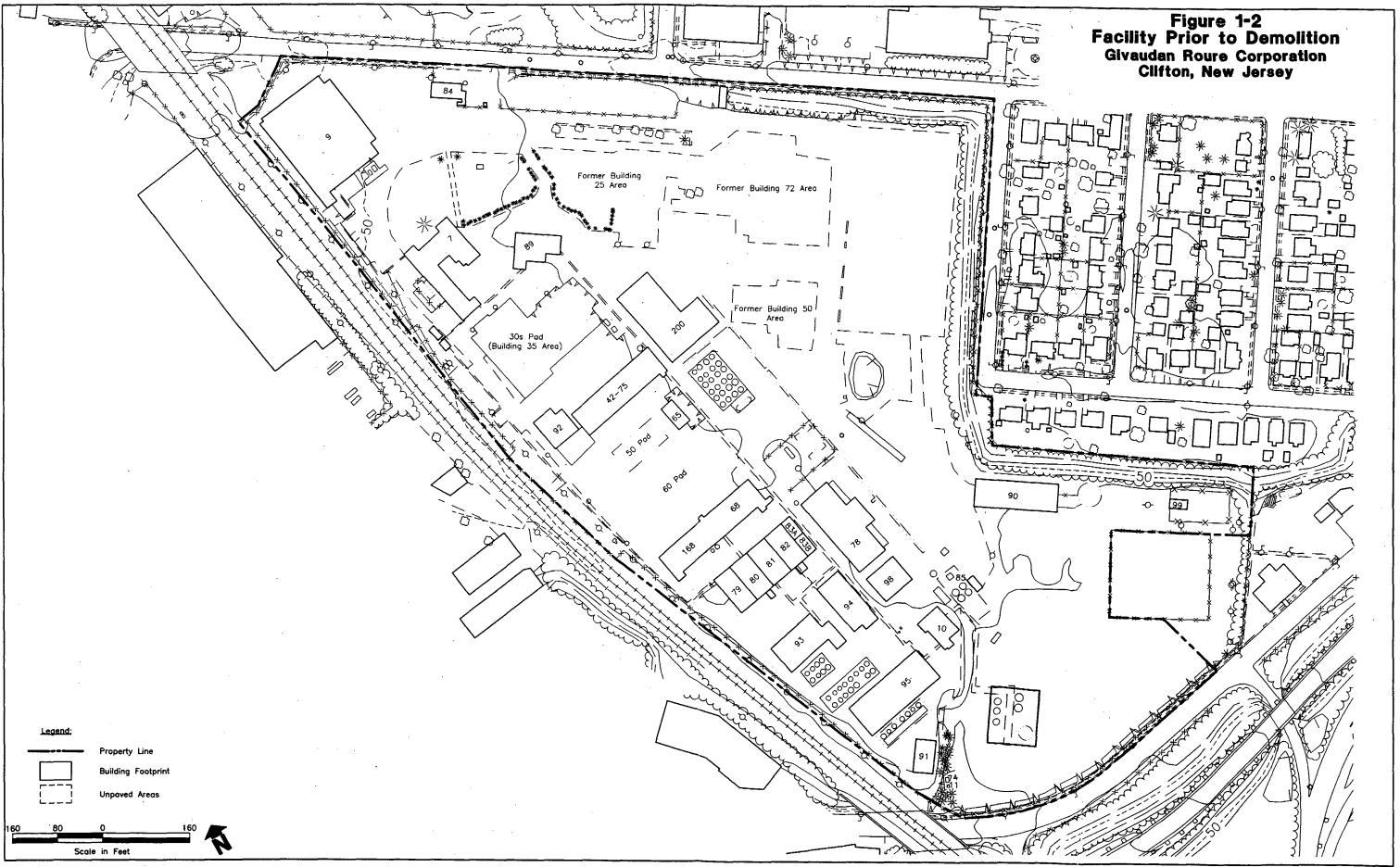
DEMOLITION WORK AT GIVAUDAN COMPLEX

Α.	1970	-	Pavan House River Road	Marinaro Wrecking Co. 22 Hanover St. Clifton, N.J. 07055
В.	1970	-	Hoffmann la Roche Whse. Delawanna Avenue	Marinaro Wrecking Co.
C.	1971	-	Krouse-Doremus Bldg. Delawanna Avenue	Petillo Bros. 63 Hornblower Avenue Belleville, N.J. 07109
D.	1973	-	Jim Wricht's House Delawanna Avenue	Marinaro Wrecking Co.
E.	1978	-	2 Story House 253 River Road	West Orange Contracting 606 Eagle Rock Avenue West Orange, N.J. 07052
F.	1978	-	Building #48 (For Bldg. 200)	American Wrecking Corp. Plaza Nine 900 Rt. #9 Woodbridge, N.J. 07095
G.	1982	-	Bldgs. 1, 2, 3, 4, 4A, 5, 6, 8, 12, 12A, 12B 13, 14, 20, 21	Marinaro Wrecking Co.



ATTACHMENT C

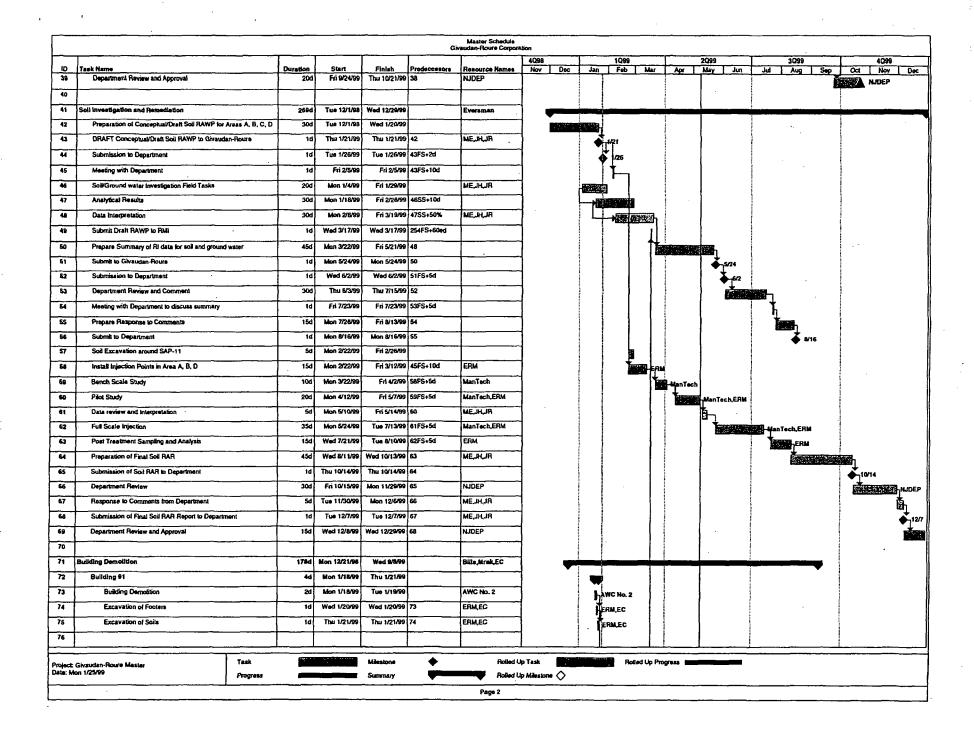
PRE-DEMOLITION SITE MAP (1/6/1999)

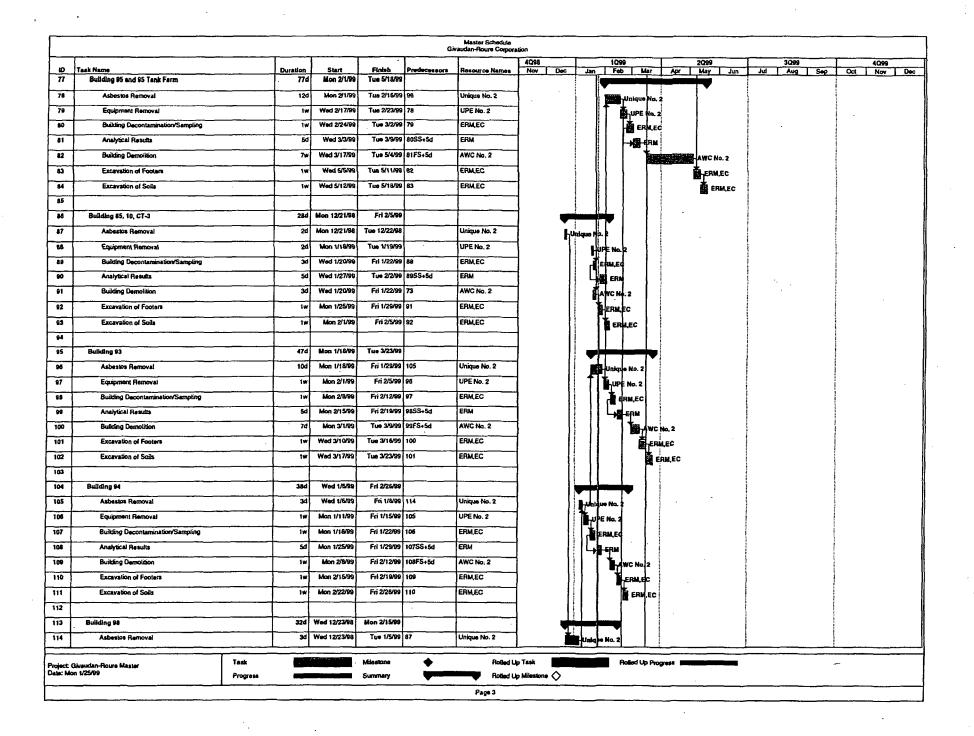


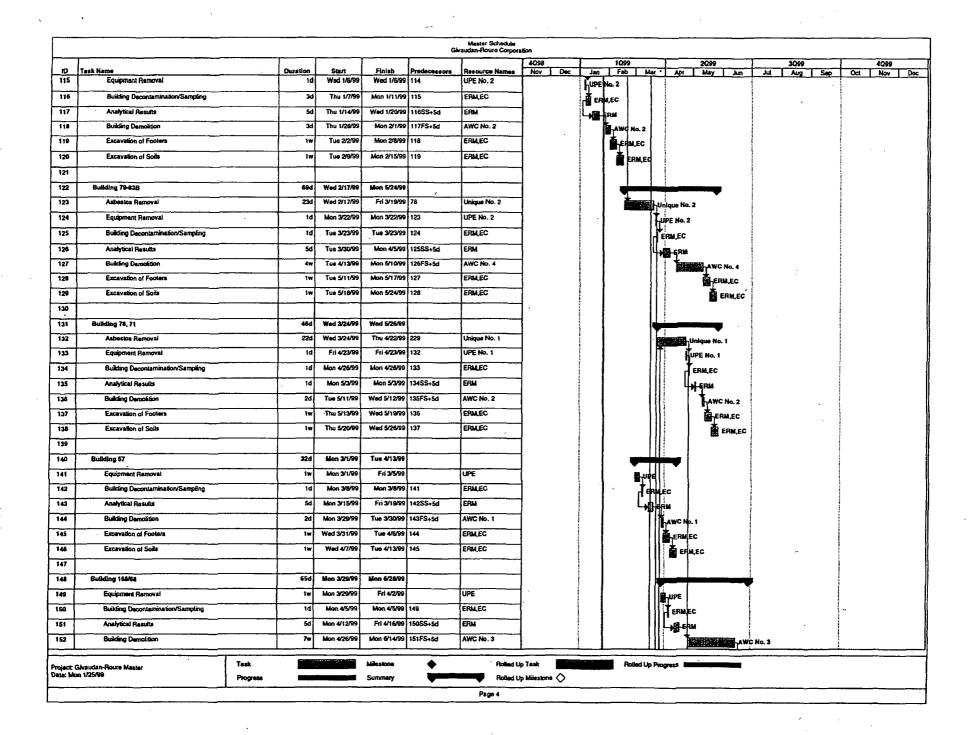
ATTACHMENT D

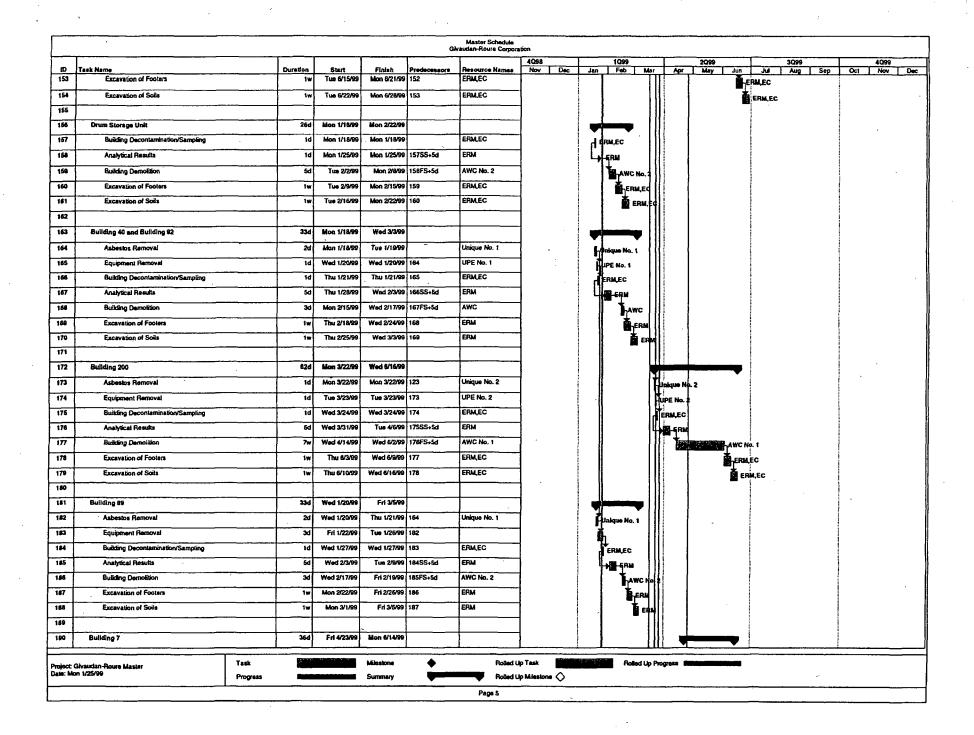
SUMMARY TABLE OF DEMOLITION ACTIVITIES (1998-1999)

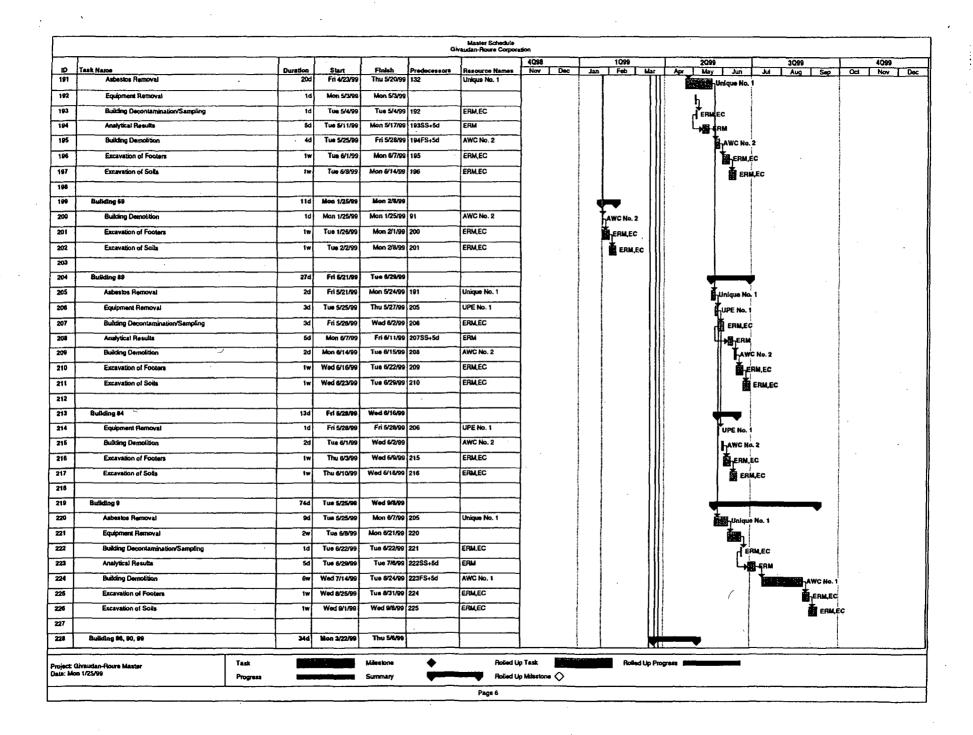
Master Schodule Giraudan-Roure Comoration 3099 4Q99 Finish Resource Names Nov Dec Jan Feb Mar Apr May Jun Task Name Duration Nov Dec TCDD Remedial Action Report Thu 2/18/99 51d Tue 12/1/98 Eversman 2 Revise Deed Notice 104 Tue 12/1/98 Mon 12/14/98 Eversman Check and Revise RAR 15d Tue 12/15/98 Wed 1/13/99 2 Eversman Submit to Department Thu 1/21/99 Thu 1/21/99 3FS+5d 4 Eversman Department Review and Approval 20d Fri 1/22/99 Thu 2/18/99 NJDEP NJDEP Thu 5/13/99 7 North Side Due Diligence 1114 Tue 12/1/98 Everemen Prepare Draft Site Investigation Report 20d Wed 1/6/99 Tue 12/1/98 Hogue Excavate Railroad Area Tue 1/19/99 . 20d Mon 12/14/98 10 Clean Sumps Mon 12/21/98 Tue 1/5/99 Tue 2/23/99 9FS+10d 11 Chemical Analytical 15d Wed 2/3/99 Tue 3/30/99 11 Prepare Final Site Oraft SI Report/Neg Dec 254 12 Wed 2/24/99 Eversman 13 Submit SI Report and Neg Dec. to Department Wed 3/31/99 Wed 3/31/99 12 30d Wed 5/12/99 13 14 Department Review and Approval Thu 4/1/99 North Side property available to transfer to RMI Thu 5/13/99 14 15 Thu 5/13/99 16 17 Sewer System Excavation Activities 2064 Mon 1/4/99 Thu 10/21/99 Wroblewski Characterization Analytical Returned Thu 1/7/99 Thu 1/7/99 Ship soil to Clean Earth 15d Mon 1/11/99 Fri 1/29/99 18FS+1d Tue 1/19/99 18FS+5d 3d Fri 1/15/99 20 Ship water offsite for disposal 21 Pump water from Pond Thu 4/1/99 Mon 4/5/99 Crew 1Ex 22 Excavation of Pond (Crew 1) Sd Tue 4/6/99 Mon 4/12/99 21 Mon 4/26/99 22FF+10d Analytical Results of Pond Tue 4/13/99 23 10d Ship Roll-offs off-site Fri 4/30/99 Fri 4/30/99 23FS+3d 24 1d Fri 2/12/99 Crew 2Ex 25 Hot Spot Excavation (Crew 2) 30d Mon 1/4/99 Fri 2/26/99 25FF+10d 26 Analytical Results from Hot Spot Excavation 15d Mon 2/8/99 Tue 6/15/99 22 Crew 1Ex 27 454 Tue 4/13/99 Excavation of New Chemical Sewer (Crew 1) TO SHOULD BE 28 Analytical Results from New Chemical Sewer 15d Wed 6/9/99 Tue 6/29/99 27FF+10d 45d Mon 2/15/99 Fri 4/16/99 25 Crew 2Ex 29 Excavation of Storm Sewers (Crew 2) 30 Analytical Results from Storm Sewers 15d Mon 4/12/99 Fri 4/30/99 29FF+10d 31 Excavation of Old Chemical Sewers 20d Wed 5/5/99 Wed 6/2/99 82 Analytical Results from Old Chemical Sewers 15d Thu 6/3/99 Wed 6/23/99 Fri 4/30/99 33 Soil Management (Stockpiling, sampling, transportation) 85d Mon 1/4/99 34 Backlitting and regrading Wed 3/3/99 Wed 5/26/99 33SS+50% RW,ME,JH,JR Prepare RAR for Sewer System Closure 35 120d Mon 2/1/99 Tue 7/20/99 19 RW,ME,JH,JR Wed 7/21/99 35 36 Submit to Department 10 Wed 7/21/99 37 Department Review and Comment 30d Thu 7/22/99 Wed 9/1/99 36 Preparation of Response to Comments 15d Thu 9/2/99 Thu 9/23/99 37 RW.ME.JH.JR. AL,HL, 3M,WA, Task Rolled Up Task Rolled Up Progress III Project: Givaudan-Roure Master Date: Mon 1/25/99 Rolled Up Milestone

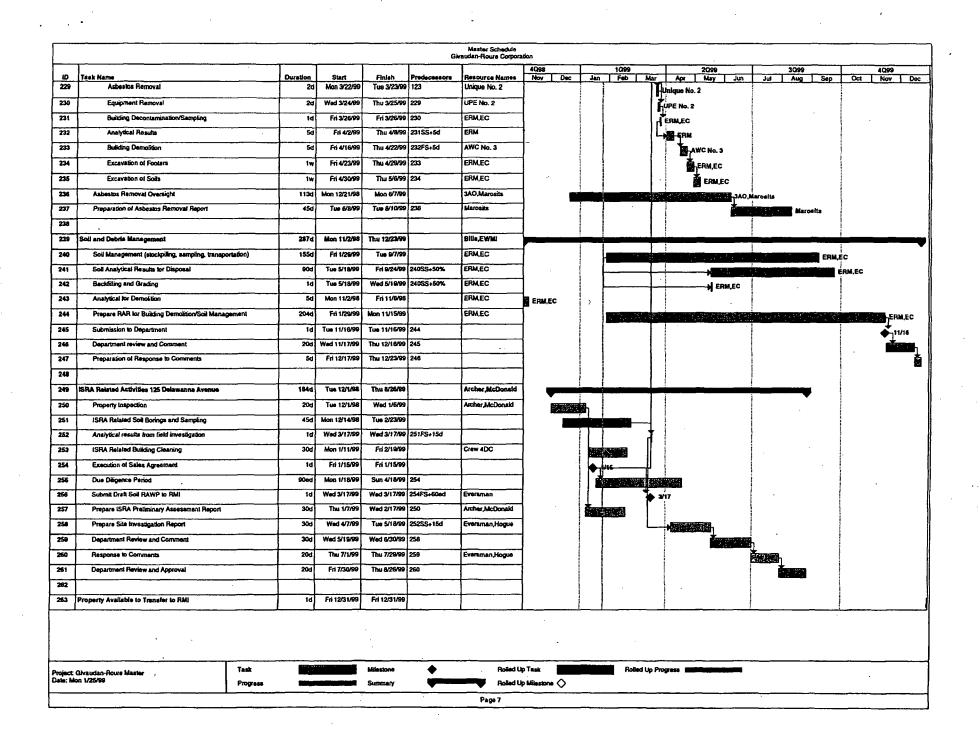






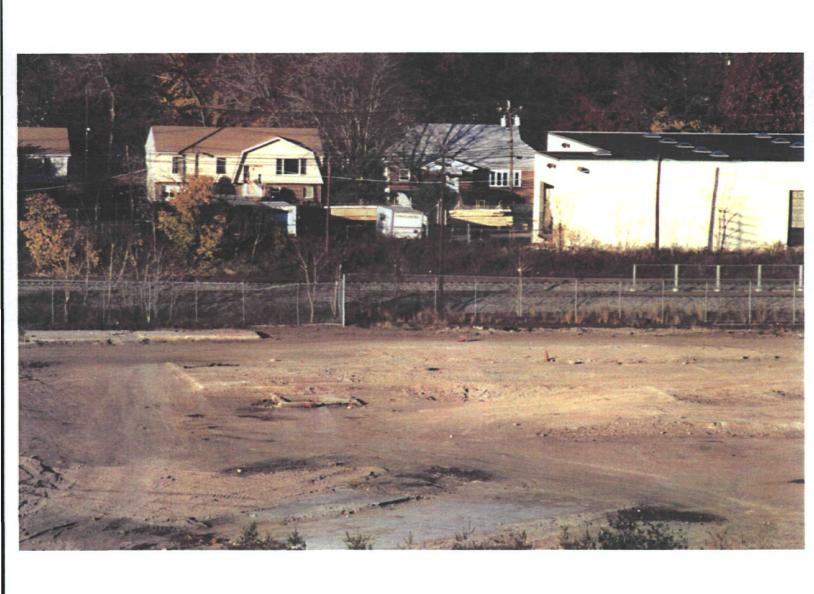


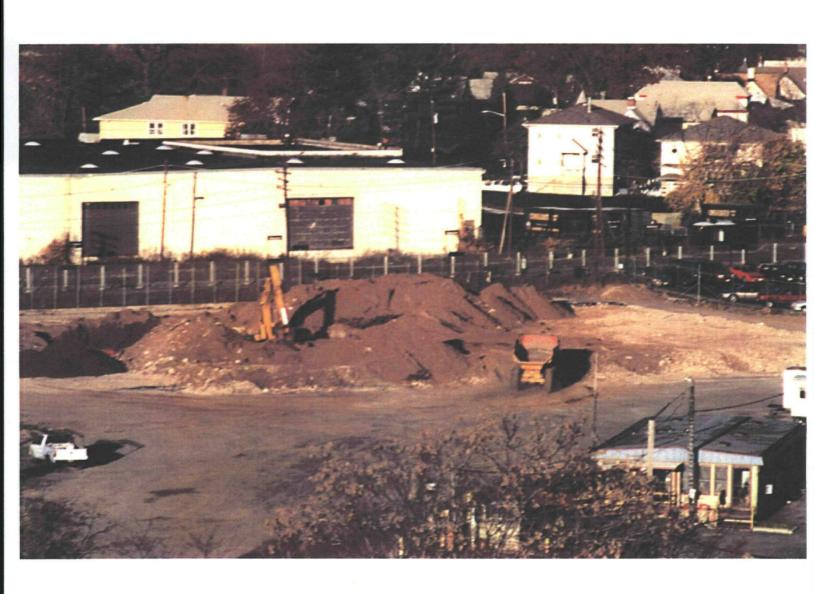




ATTACHMENT E

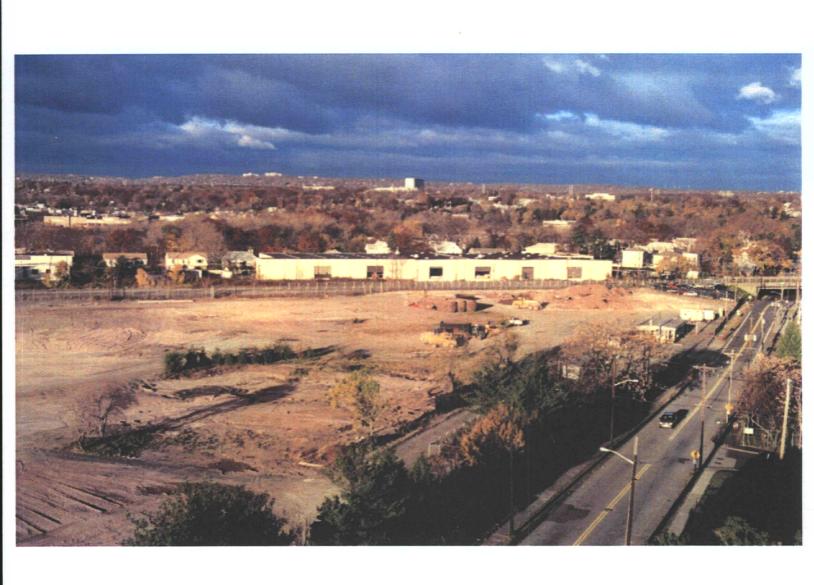


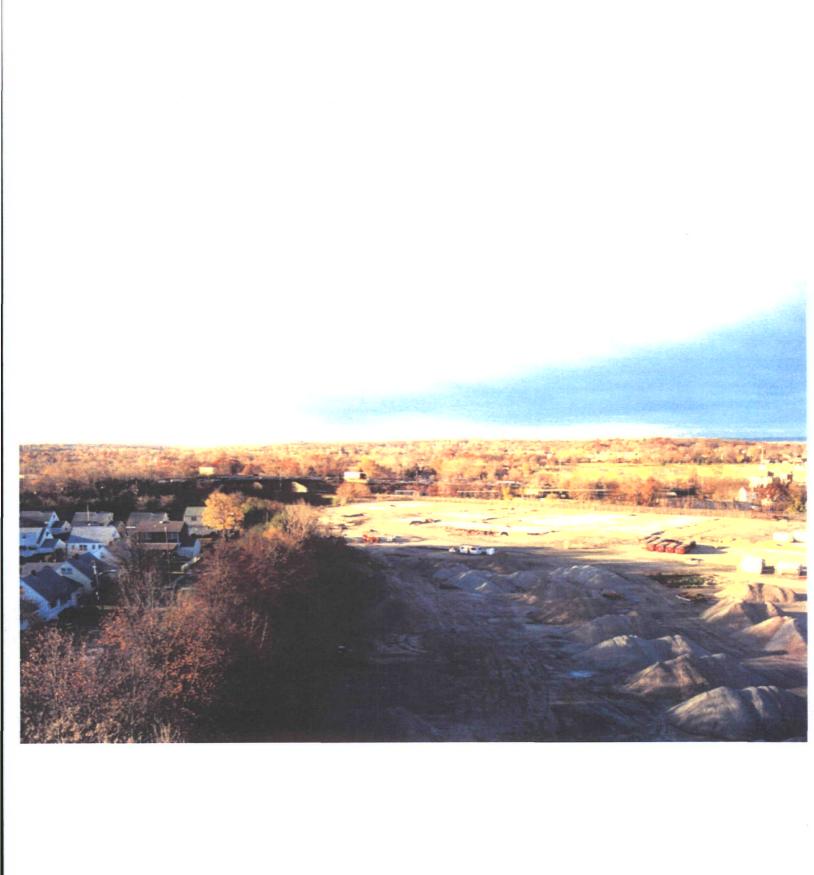






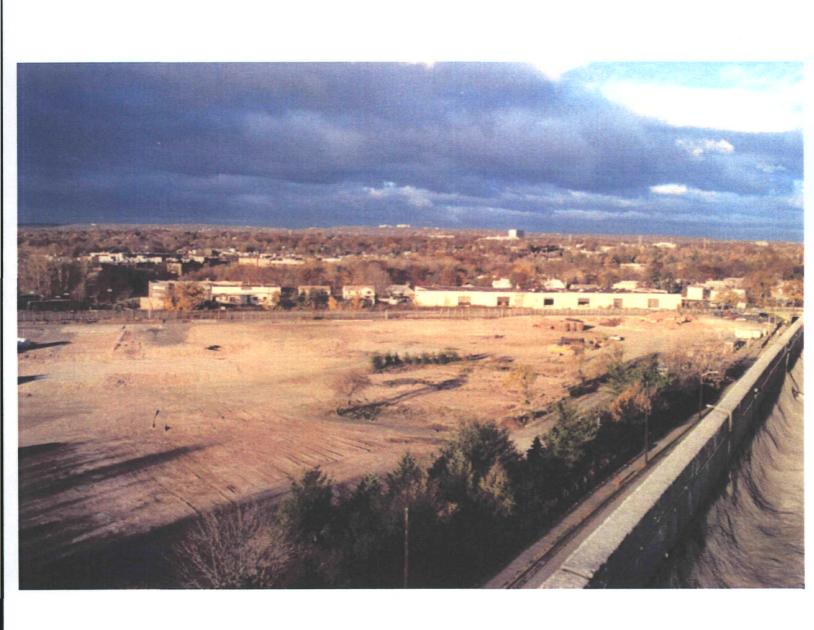
















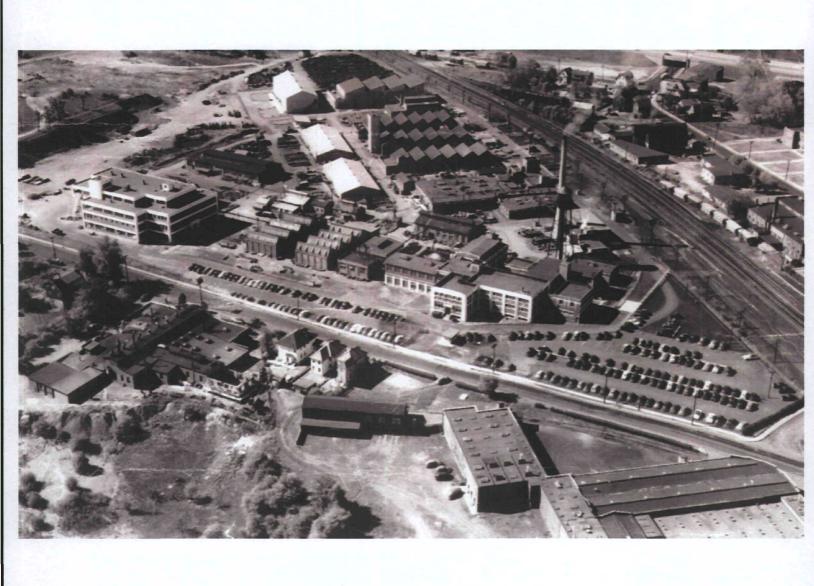


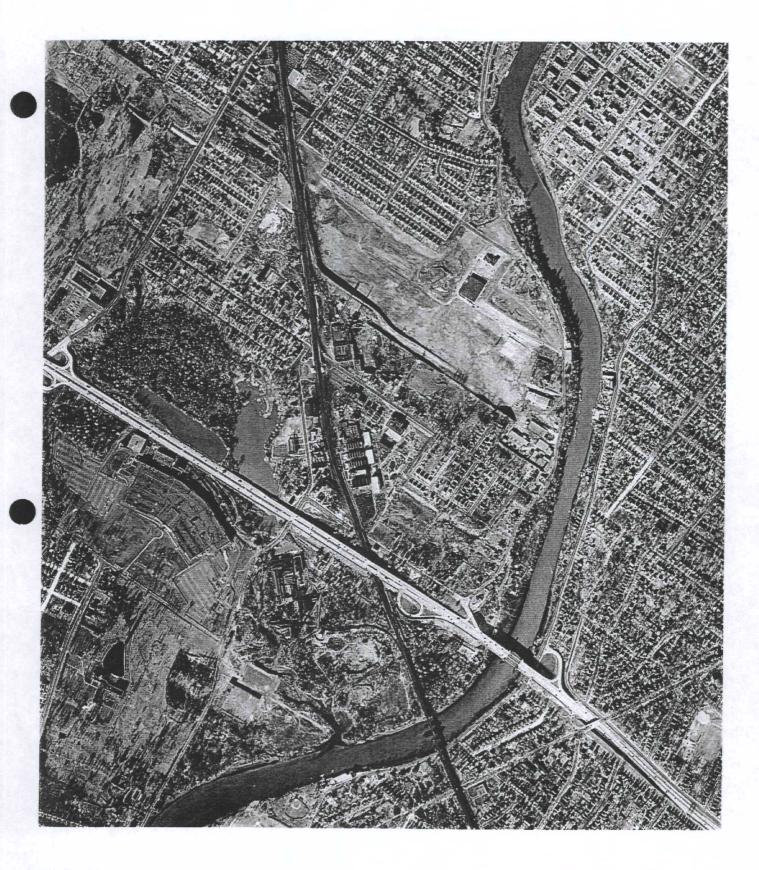


ATTACHMENT F

AERIAL PHOTOS OF THE FORMER GIVAUDAN FACILITY AND SURROUNDING AREAS





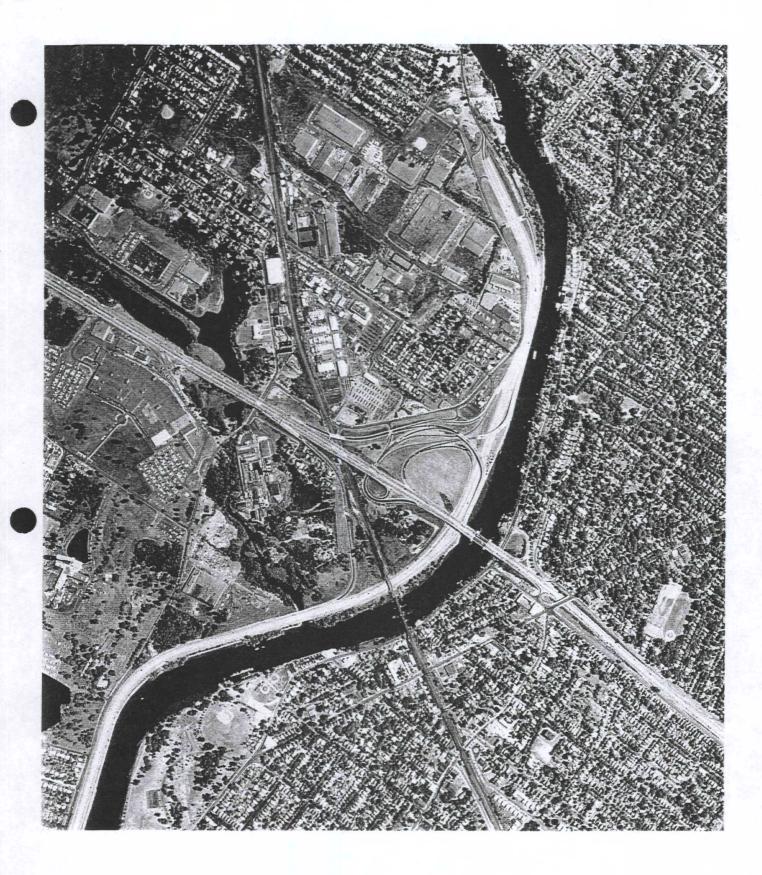








Client:	ERM Group, Inc.
Site Address:	100 Delawanna Avenue
USGS Quad:	Orange
City/Town(ship):	Clifton
County/State:	Passaic, New Jersey
Scale:1"=1000	Originally flown at: 1"=1667"
Project Number:	97-1852
Date of Photograp	phy: December 5, 1953





National Aerial Resources Rensselaer Technology Park 385 Jordan Road Troy, NY 12180





 Client:
 ERM Group, Inc.

 Site Address:
 100 Delawanna Avenue

 USGS Quad:
 Orange

 City/Town(ship):
 Clifton

 County/State:
 Passaic, New Jersey

 Scale:
 1"=1000"
 Originally flown at:
 1"=1667"

 Project Number:
 97-1852

 Date of Photography:
 June 22, 1966

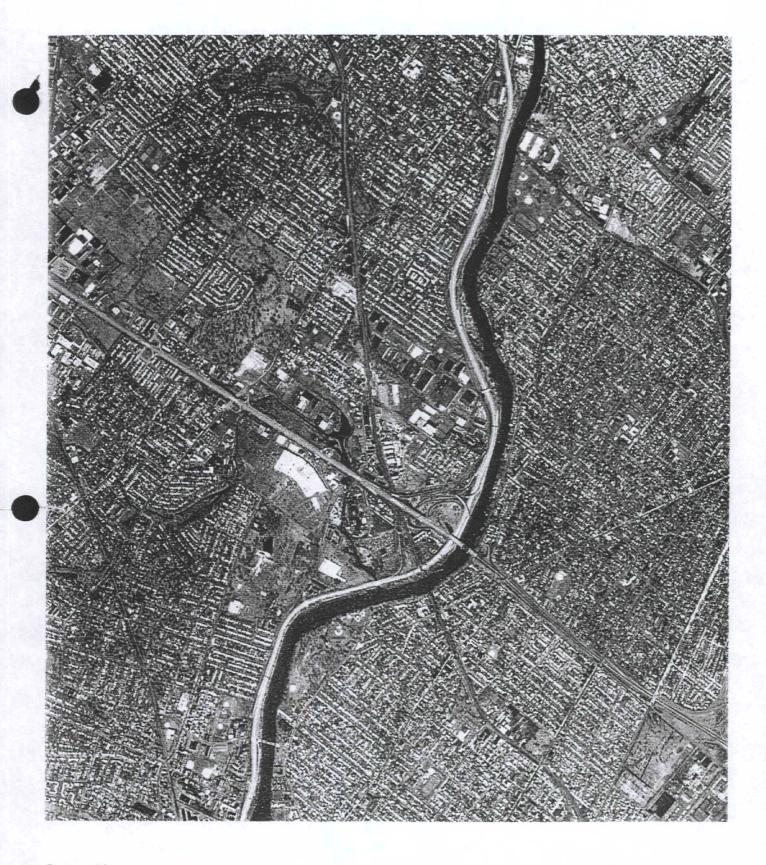








Client:	ERM Group, Inc.
Site Address:	100 Delawanna Avenue
USGS Quad:	Orange
City/Town(ship):	Clifton
	Passaic, New Jersey
Scale: <u>1"=1000"</u>	
Project Number: _	
Date of Dhatassan	hie Eshmon 21 1070









Client:	ERM Group, Inc.		
Site Address:	100 Delawanna Avenue		
USGS Quad:	Orange		
City/Town(ship):	Clifton		
County/State:	Passaic, New Jersey		
Scale: 1"=2000			
Project Number:	97-1852		
	ohy: March 16, 1985		









Client:	ERM Group, Inc.			
Site Address:	100 Delawanna Avenue			
USGS Quad:	Orange			
City/Town(ship):	Clifton			
County/State:	Passaic, New Jersey			
_	Originally flown at: 1"=6667"			
Project Number:	97-1852			
Date of Photograp	ohy: March 16, 1985			





National Aerial Resources Rensselaer Technology Park 385 Jordan Road Troy, NY 12180

A division of e data resources, inc.



Client:	ERM Group, Inc.
Site Address:	100 Delawanna Avenue
USGS Quad:	Orange
City/Town(ship):	Clifton
County/State:	Passaic, New Jersey
Scale:	Originally flown at: 1"=3333"
Project Number:	97-1852
Date of Photograp	ohy: March 29, 1995

